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March 21, 2022

Hon. Sidney H. Stein  
United States District Court  
500 Pearl Street  
New York, New York 10007  
via ECF

**MEMO ENDORSED**

**Re: United States v. Samuel Sosa**  
19 Cr. 795 (SHS)

Your Honor :

Pursuant to the Court's instructions at the conference on Mr. Sosa's case, I write to update the Court on the status of efforts to enroll him in an appropriate program. Unfortunately, although progress has been made, Sammy has not yet started in the Beyond Twenty-One program. He is still on track to enter the program, once the final requirement of enrollment in a NJ medicaid insurance program is completed, but that is expected to take at least forty five days.

Nearly two months after an application was made for him, Sammy has been contacted by the New Jersey Department of Labor, Division of Vocational Rehabilitation Services, which works with people such as Sammy who need training and assistance to find suitable work. We hope that he will be able to begin participating in the services provided by that agency soon. A updated status letter from Antonella Caiazza, the Social Worker who has been assisting Sammy is attached. (Exhibit A)

Sammy remains on home detention with an electronic monitor and has not had any problems. In light of the forgoing, I request that the Court set a date for a further update on this matter in sixty days.

Respectfully,

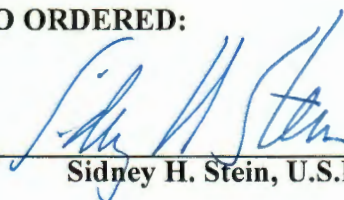
*Lisa Scolari*

Lisa Scolari

**The parties shall file a further status report on or before May 20, 2022.**

**Dated: New York, New York**  
**March 21, 2022**

**SO ORDERED:**



**Sidney H. Stein, U.S.D.J.**

## CONSULTING PROJECT

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### ADDENDUM TO PRE-SENTENCE MEMORANDUM

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March 19, 2022

**RE: Update on Samuel Sosa (Docket 19Cr-00795-009)**

Dear Judge Sidney H. Stein,

On behalf of Mr. Sosa and his family, I would like to first thank you for understanding the uniqueness of Mr. Sosa's case due to his developmental disabilities and how his disabilities have significantly contributed to the current circumstances he is in and impacted the trajectory of his life thus far. Throughout his lifetime, Mr. Sosa did not receive the proper diagnoses or treatments, and as discussed at his last court date, we have been working tirelessly to secure a program for Mr. Sosa that would assist him with learning and maintaining skills required for daily living and finding adequate employment based on his competency and level of functioning, with the hopes that these interventions would help reduce recidivism and pave the way for Mr. Sosa to be a more independent and productive member of society.

I have been in constant contact with Mr. Sosa's mother (Francisca Cepeda) and the program Director and Social Worker at the Beyond 21 Program (through Attain & Gain Counseling) we discussed on Mr. Sosa's prior court date. Since then, Mr. Sosa (with the help of his mother and brother, as well) has been compliant and has attended the mandatory tour of the facility, met with staff members and was assessed to determine eligibility and fit for the program, and underwent the mandatory physical examination by his Primary Care Physician, who also filled out necessary forms for the program with Mr. Sosa's developmental diagnoses. The final step that needs to be completed before he begins the program is verification of New Jersey Medicaid and health insurance the program accepts, which unfortunately is taking longer than expected to process and be approved. Mr. Sosa has received confirmation that his registration is being reviewed, and he is in the process of sending all required documents as well. This process, alone, usually takes about 45 days, and we are all working very hard to expedite it as much as possible. Unfortunately, due to unforeseen events (Director of program and social worker both unexpectedly being on medical leave, which delayed the process more) and the effects of the Covid-19 pandemic delaying an already arduous process, Mr. Sosa has not yet started the program, but he is on track to start as soon as Medicaid and health insurance are verified.



Mr. Sosa also has made progress with the Division of Vocational Rehabilitation Services, which I referred him to. Mr. Sosa is in the process of scheduling a Zoom call with Jessica R. Cole, a Vocational Rehabilitative Counselor, to discuss eligibility requirements. The Division of Vocational Rehabilitative Services is a federally-funded program which provides job training for individuals with physical and/or intellectual disabilities. This program would be beneficial for Mr. Sosa to find employment based on his skills and competency relative to his functioning as an individual with intellectual disabilities. This program (and future employment), along with the Beyond 21 program, could potentially shift the trajectory of Mr. Sosa's life by paving the way for a more successful future and greatly decreasing the likelihood of recidivism.

I understand that it may be disappointing that Mr. Sosa has not been able to begin these programs as of yet, but I assure you we are doing everything we can to expedite the process. We respectfully ask the Court to consider adjourning Mr. Sosa's sentencing hearing once more, as we patiently await these programs complete their stringent screening processes.

Thank you in advance for your patience and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Antonella Caiazza". The signature is fluid and cursive, with a long, sweeping underline.

Antonella Caiazza, LMSW  
Forensic Social Work Consultant